

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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September 18, 2023

**BY ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**RE: United States v. Burgos-Hernandez et al.**  
**22 Cr. 133 (JGK)**

Dear Judge Koeltl:

I write with the consent of the government to respectfully request that the Court modify Franklin Bello Jimenez's bail conditions in the above-captioned matter to allow him to travel Boston, MA to visit his mother with his brother on Saturday, September 23. Pretrial services consents to this request.

On February 17, 2022, Magistrate Judge Gabriel W. Gorenstein released Mr. Bello Jimenez on his own signature and imposed the following bail conditions: a \$25,000 personal recognizance bond cosigned by two financially responsible persons; travel limited to the SDNY/EDNY; surrender all travel documents with no new applications; pretrial supervision as directed by pretrial services; maintain or seek employment; no contact with co-defendants except in the presence of counsel; no new loans or lines of credit without prior approval from pretrial services. Mr. Bello Jimenez's bail conditions were timely satisfied.

For the past 19 months, Mr. Bello Jimenez has remained compliant with the conditions of release, including attending his sentencing hearing on July 19, 2023. The Court has previously granted Mr. Bello Jimenez a temporary bail modification to travel to visit his mother on August 14, 2022 and October 15, 2022, to spend the holidays with family in Boston, MA, and to travel to the Dominican Republic on March 15, 2023 to attend his father's wake and burial.

Mr. Bello Jimenez now requests permission to travel to Boston, MA to visit his mother with his brother on September 23, 2023. The government and pretrial services consent to this request.


Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne L. Lenox  
Assistant Federal Defender  
(212) 417-8721

**SO ORDERED:**

  
**THE HONORABLE JOHN G. KOELTL**  
United States District Judge  
9/18/23

cc: Sarah Kushner, Assistant U.S. Attorney